

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

\*\*\*\*\*

UNITED STATES OF AMERICA,

Criminal No. 09-CR-507 (DNH)

v.

BALDEO SAHABIR and  
KAMLA SAHABIR,

Defendants.

\*\*\*\*\*

**REPLY MEMORANDUM OF THE UNITED STATES**

The defendant Kamla Sahabir has objected to the introduction of tax return information because there is a pending New York state investigation involving the Sahabirs. It is important to note that the tax returns which the government intends to offer are federal returns. There is no intention on the part of the government to make mention of, or to offer, any evidence of state tax returns or the lack thereof. The defendant's objection therefore is unfounded. For the reasons set forth in the earlier memorandum on this issue filed by the government, the tax return information should be admissible at trial.

Dated: July 28, 2010

Respectfully submitted,

Richard S. Hartunian  
United States Attorney

/s/

By: Edward R. Broton  
Assistant U.S. Attorney  
Bar Roll No. 101230

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

\*\*\*\*\*

**UNITED STATES OF AMERICA,**

**v.**

**Criminal Action No.  
09-CR-507**

**BALDEO SAHABIR and  
KAMLA SAHABIR,**

**Defendants.**

\*\*\*\*\*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 28, 2010, I electronically filed the **GOVERNMENT'S  
REPLY MEMORANDUM** with the Clerk of the District Court using the CM/ECF system.

Stephen Coffey, Esq.

E. Stewart Jones, Jr., Esq

/s/  
Paula Briggs